

AFFIDAVIT

Your affiant, Tracey Burdette, first being duly sworn, states as follows:

1. I, Tracey Burdette, being duly sworn, state, and depose that I have been a Special Agent with the Federal Bureau of Investigation for the last fourteen years. In this capacity, I have had experience and training in the enforcement of Title 18 of the United States Code. I have conducted and assisted in numerous investigations of crimes against children, violent crimes, and white collar crimes, and have received training in investigating all these offenses. I have also authored and assisted in executing numerous federal search warrants.
2. The facts and information contained herein are based upon my personal knowledge and observation made during the course of this investigation, information conveyed to me by other law enforcement officials, and my review of records, documents, and other evidence obtained during this investigation.
3. This Affidavit is made in support of a criminal complaint against ANGELA SAMANTHA BENTOLILA, year of birth: 1982, for violations of Title 18, United States Code, Sections 371 and 1591 (Conspiracy to Commit Sex Trafficking). Because this Affidavit is being submitted for the limited purpose of securing a criminal complaint, your affiant has not included each and every fact known to her concerning this investigation.

STATUTORY AUTHORITY

4. This investigation concerns alleged violations of 18 U.S.C. §§ 371 and 1591(a). Title 18, United States Code, Sections 371 and 1591(a) make it a federal crime for anyone to knowingly, in and affecting interstate and foreign commerce, combine, conspire,

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confederate and agree to commit an offense against the United States, namely, to recruit, entice, harbor, transport, provide and obtain by any means a person, and benefit financially and by receiving anything of value from participation in a venture engaged in such acts, knowing that force, fraud, and coercion would be used to cause the person to engage in a commercial sex act, and knowing that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act, all in violation of Title 18, United States Code, Section 1591(a).

5. "MP" was a minor at all times during April and May 2007.
6. I, as well as other law enforcement officers, have interviewed numerous witnesses, many of whom have testified under oath in grand jury, and all of whom have provided information relating to events that occurred between April and May 2007, including two cooperating eye witnesses (hereinafter referred to as "CW-1" and "CW-2"), regarding BENTOLILA's involvement with Lloyd Mack Royal, III a/k/a "Blyss" a/k/a "B" a/k/a "Furious," in a conspiracy to commit sex trafficking whereby BENTOLILA and the co-conspirators engaged in the following acts and practices that served to enhance their ability to control and coerce the known victims in furtherance of the conspiracy:
  - a. targeted young, vulnerable minors to engage in commercial sex acts;
  - b. used force, threats of force, and physical assaults;
  - c. provided "MP" with cocaine, "dippers" or "ciga-wets" (cigarettes dipped in phencyclidine liquid ("PCP")), marijuana, alcohol and other controlled substances;
  - d. provided shelter, clothing, condoms and food to "MP;"

- e. asserted authority over "MP" by forbidding "MP" from contacting certain individuals;
  - f. asserted authority over "MP" by forcing "MP" to kiss the pinky ring of a co-conspirator, refer to a co-conspirator as "daddy," engage in frequent sexual activities with a co-conspirator, and by speaking to "MP" in derogatory and offensive terms;
  - g. told "MP" to lie about "MP's" age and pretend to be more than 18 years of age;
  - h. told "MP" that "MP" would be engaging in sex acts for which co-conspirators would receive payment;
  - i. instructed "MP" on pricing for different sexual activities;
  - j. received monies and things of value when a minor, namely "MP," engaged in commercial sex acts; and
  - k. used vehicles, public highways, hotels, private residences, telephones and the internet.
7. According to CW-1, CW-1 was present during "MP's" commercial sex acts (including but not limited to fellatio and intercourse) with CW-2 in Washington, D.C. on April 21, 2007.
8. According to CW-2, CW-2 paid for the commercial sex acts (including but not limited to fellatio and intercourse) with "MP" on April 21, 2007 in Washington, D.C.
9. According to numerous sources, including CW-1 and CW-2, on or about April 21, 2007, BENTOLILA:

- a. provided her residence, clothing, sanitary items and a vehicle to co-conspirators for the purpose of facilitating the commercial sex acts (including but not limited to fellatio and intercourse) with "MP;"
  - b. provided her vehicle so that "MP" would be transported from Maryland to the District of Columbia to engage in commercial sex acts; and
  - c. provided "MP" with cocaine before causing "MP" to engage in commercial sex acts.
10. In addition to the self-corroboration between the witnesses aforementioned, witness accounts have been corroborated by items including but not limited to relevant hotel receipts that separately reflect the names of a co-conspirator and a sex customer, telephone records showing numerous calls between the sex customers and one or more conspirators as well as between the co-conspirators themselves on the relevant dates, and evidence seized pursuant to state search warrants executed in May and June of 2007 that included provocative clothing that matched those provided by a co-conspirator for "MP" to wear during the aforementioned sex acts.
11. On January 28, 2009, co-conspirator Lloyd Mack Royal, III, a/k/a "Blyss" a/k/a "B" a/k/a "Furious," was indicted by a grand jury in the District of Maryland on charges of Conspiracy to Commit Sex Trafficking, 18 U.S.C. § 371; Sex Trafficking, 18 U.S.C. § 1591; Possession of a Firearm in Furtherance of a Crime of Violence, 18 U.S.C. § 924(c); and Aiding & Abetting, 18 U.S.C. § 2.

### Conclusion

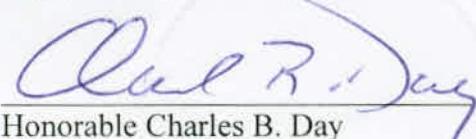
Based on the aforementioned factual information, there is probable cause to believe that ANGELA SAMANTHA BENTOLILA has violated Title 18 U.S.C. Sections 371 and 1591(a) (Conspiracy to Commit Sex Trafficking of a Minor and by Force, Fraud and Coercion).



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Tracey Burdette  
Special Agent, Federal Bureau of Investigation

Subscribed and sworn before me on this 28<sup>th</sup> day of January, 2009.



Honorable Charles B. Day  
United States Magistrate Judge  
Southern Division